

COURT DOCKET - MADISON COUNTY CIRCUIT CLERK
Case: 2016L 001520 WILSON STEVEN J vs DAVIS JOSEPH L
Type: NEGLIGENCE Judge: RUTH DENNIS Jury Trial: NJ
From: 00/00/0000 To: 99/99/9999 All Case Entries First Date First View
Filed: 11/10/2016 Status: Open Case on 11/10/2016

PAGE: 1
DATE: 2017-03-07
TIME: 08.57.45

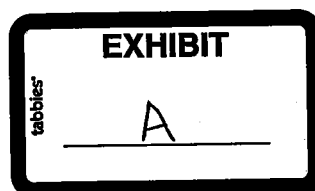
CASE PARTICIPANTS NAMES

ATTORNEYS

PLA WILSON STEVEN J
DEF DAVIS JOSEPH L
DEF WERNER ENTERPRISES INC A NEBRASKA CORPORATION
SALVI ALBERT J

DATE

11/04/2016 Negligence Fee \$227.00 Amt \$50000.01 Plaintiff WILSON STEVEN J
Defendant DAVIS JOSEPH L
11/04/2016 CLEARED FOR PUBLIC
11/04/2016 AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(B) FILED BY
Plaintiff WILSON STEVEN J
11/04/2016 JA Assignment Order THE HONORABLE DENNIS RUTH
Document JAORDER.DOC Was Printed
11/04/2016 MINUTE RECORD
Document MINREC.DOC Was Printed
11/04/2016 CASE LABEL PRINTED
Document CSLABEL.DOC Was Printed
11/10/2016 SUMMONS ISSUED AND SENT TO ATTY ISSUED Defendant DAVIS JOSEPH L
Defendant WERNER ENTERPRISES INC A NEBRA
Document SU30DAY.DOC Was Printed
01/30/2017 COPY REQUEST AND ALIAS SUMMONS REQUESTED. FEE \$9.00
01/31/2017 ALIAS SUMMONS Fee \$5.00 Plaintiff WILSON STEVEN J
01/31/2017 Copies Fee \$4.00 Plaintiff WILSON STEVEN J
01/31/2017 ALIAS SUMMONS issued and sent to Salvi and Maher ISSUED
Defendant DAVIS JOSEPH L Defendant WERNER ENTERPRISES INC A NEBRA
Document SVALIAS.DOC Was Printed



Page 1

4. That on November 6, 2014, Defendant, Joseph L. Davis, initiated and/or caused a two vehicle collision, wherein his vehicle struck the rear end of the vehicle operated by Plaintiff, Steven J. Wilson.
5. That said collision occurred at a point on Interstate 270 at or near Milepost 2.5, Chouteau Township, Madison County, Illinois.
6. That on November 6, 2014, the Defendant, Joseph L. Davis, owed a duty to the Plaintiff, Steven J. Wilson, to exercise reasonable care in the operation of his motor vehicle.
7. That on November 6, 2014, the Defendant, Joseph L. Davis, breached that duty and was negligent in one or more of the following respects:
 - a. Followed a vehicle more closely than was reasonable and prudent, in violation of 625 ILCS 5/11-710;
 - b. Failed to maintain control and direction over the operation of his motor vehicle so as to cause his vehicle to collide with the vehicle directly in front of him;
 - c. Failed to keep a proper and sufficient lookout for vehicles upon the highway;
 - d. Drove his vehicle at a speed which was greater than was reasonable and proper with regard to traffic conditions and the use of the highway in violation of 625 ILCS 5/11-601;
 - e. Failed to reduce the speed of his vehicle to avoid colliding with the vehicle directly in front of him in violation of 625 ILCS 5/11-601;
 - f. Failed to sound the horn on his vehicle so as to give warning of his approach, in violation of 625 ILCS 5/12-601;
 - g. Failed to operate a vehicle equipped with brakes adequate to control the movement of and to stop and hold his vehicle, in violation of 625 ILCS 5/12-301.
8. That as a proximate result of one or more of the foregoing negligent acts or omissions by the Defendant, Joseph L. Davis, the Plaintiff, Steven J. Wilson, was and became bodily injured, both internally and externally; suffered and will in the future suffer pain, disability, and loss of a normal life; has and will become obligated for large sums of money for medical care; has suffered and will in the future suffer lost income.

WHEREFORE, Plaintiff, Steven J. Wilson, demands judgment against Defendant, Joseph L. Davis, in excess of the minimum jurisdictional limit of the law division of the Circuit Court of Madison County.

COUNT II
NEGLIGENCE
(Steven J. Wilson v. Werner Enterprises, Inc.)

NOW COMES the Plaintiff, Steven J. Wilson, by and through his attorneys, Salvi & Maher, LLC, and complaining of the Defendant, Werner Enterprises, Inc., states as follows:

- 1-7. The Plaintiff, Steven J. Wilson, restates and incorporates paragraphs 1 through 7 of Count I of this Complaint as and for paragraphs 1 through 7 of Count II of this Complaint.
8. That on November 6, 2014, and at all times material, the Defendant, Joseph L. Davis, was an agent of the Defendant, Werner Enterprises, Inc., acting within the scope of his duties.
9. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions by the Defendant, Werner Enterprises, Inc., the Plaintiff, Steven J. Wilson, sustained severe and permanent injuries, both externally and internally; suffered and will in the future suffer pain, disability, disfigurement, and the loss of a normal life; has become and will in the future become obligated for large sums of money for medical care.

WHEREFORE, the Plaintiff, Steven J. Wilson, demands judgment against the Defendant, Werner Enterprises, Inc., in excess of the minimum jurisdictional limit of the law division of the Circuit Court of Madison County:



Attorney for Plaintiff

Albert J. Salvi (ARDC# 6191178)
Salvi & Maher, LLC
325 Washington Street - Suite 302
Waukegan, Illinois 60085
Attorney Firm Number 28837
Tel: (847) 662-3303
Fax: (847) 662-3453

FILED

Case Number 2016L 001520

Transaction ID: 59792551

Date: Nov 04 2016 03:47PM

Mark Von Nida

Clerk of Circuit Court

Third Judicial Circuit, Madison County Illinois

STATE OF ILLINOIS)
) ss
COUNTY OF MADISON)

IN THE THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

STEVEN J. WILSON)

Plaintiff)

vs.)

No.: 16L1520

JOSEPH L. DAVIS and WERNER)
ENTERPRISES, INC., a Nebraska)
Corporation)

Defendants.)

AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(B)

Pursuant to Supreme Court Rule 222(B), counsel for the above-named plaintiff certifies that plaintiff seeks money damages in excess of Fifty-thousand and 00/100ths Dollars (\$50,000.00)

By:



Attorney for Plaintiff

Prepared by:

Albert J. Salvi (ARDC# 6191178)

Salvi & Maher, LLC

325 Washington Street - Suite 302

Waukegan, Illinois 60085

Attorney Firm Number 28837

Tel: (847) 662-3303

Fax: (847) 662-3453

BT2014614304

NATIONAL REGISTERED AGENTS, INC.

SERVICE OF PROCESS SUMMARY TRANSMITTAL FORM

To: Jim Mullen
WERNER ENTERPRISES, INC.
14507 Frontier Road
Omaha, NE 68138

SOP Transmittal # 530649559

312-345-4336 - Telephone

Entity Served: WERNER ENTERPRISES, INC. (Domestic State: NEBRASKA)

Enclosed herewith are legal documents received on behalf of the above captioned entity by National Registered Agents, Inc. or its Affiliate in the State of ILLINOIS on this 07 day of February, 2017. The following is a summary of the document(s) received:

1. Title of Action: Steven J Wilson, Plff. vs. Joseph L. Davis and Werner Enterprises, Inc., etc., Dfs.
2. Document(s) Served: SUMMONS & COMPLAINT
Other: Affidavit
3. Court of Jurisdiction/Case Number: Madison County - 3rd Judicial Circuit Court, IL
Case # 16L1520

Joseph Davis Jr

2014535061

11-6-14

EMR

Attn

Mike

4. Amount Claimed, if any: N/A
5. Method of Service:
☒ Personally served by: ☒ Process Server ☐ Law Enforcement ☐ Deputy Sheriff ☐ U. S Marshall
☐ Delivered Via: ☐ Certified Mail ☐ Regular Mail ☐ Facsimile
☐ Other (Explain):

6. Date and Time of Receipt: 02/07/2017 10:58:00 AM CST
7. Appearance/Answer Date: Within 30 days after this service of this summons, exclusive of the day of service

8. Received From: Albert J Salvi
Salvi & Maher, LLC
325 Washington Street
Suite 302
Waukegan, IL 60085
847-662-3303

9. Carrier Airbill # 1ZY041160192053249

10. Call Made to: Not required

11. Special Comments:
SOP Papers with Transmittal, via UPS Next Day Air

Image SOP

Email Notification: SANDY Wagner swagner@werner.com

NATIONAL REGISTERED AGENTS, INC.

Copies To:

Transmitted by Khalilah Starks

The information contained in this Summary Transmittal Form is provided by National Registered Agents, Inc. for informational purposes only and should not be considered a legal opinion. It is the responsibility of the parties receiving this form to review the legal documents forwarded and to take appropriate action.

ORIGINAL

FEB 09 2017 SJW

January 30, 2017

STATE OF ILLINOIS
IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY
155 N Main St., Edwardsville, IL 62025
(618) 692-6240
madisoncountycircuitclerkil.com

ALIAS SUMMONS

STEVEN J. WILSON
Plaintiff

CASE No. 2016 L 001520

vs
WERNER ENTERPRISES INC A NEBRASKA CORPORATION
C/O NATION REG AGENTS INC
201 S LASALLE ST SUITE #1
CHICAGO, IL 60604
Defendant

You are hereby summoned and required to file an answer in this case, or otherwise file your appearance, in the office of the Clerk of this Court, within 30 days after this service of this summons, exclusive of the day of service. If you fail to do so, a judgment or decree by default may be taken against you for the relief prayed in the complaint.

This summons must be returned by the officer or other person to whom it was given for service, with endorsement thereon of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed.

This summons may not be served later than 30 days after its date.

Witness MARK VON NIDA, Clerk of said Circuit Court and the seal thereof, at Edwardsville, Illinois, this January



MARK VON NIDA
Clerk of the Circuit Court

By: Melinda Smith
Deputy Clerk

(Plaintiff's attorney or plaintiff if he is not represented by an attorney)

ALBERT J. SALVI
SALVI & MAHER LLC
325 WASHINGTON ST
STE 302
WAUKEGAN, IL 60085

Date of Service: 7 Feb 2017

(To be inserted by officer on the copy left with the defendant or other person)

The Madison County Court makes every effort to comply with accessibility laws and provides reasonable accommodations to persons with disabilities. Hearing, visual, and other assistance may be arranged by contacting our Court Disability Coordinator, Teri Piechold at 618-296-4984.